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August 12, 1980

Dr. William Langley, Chief  
Houston Laboratory  
U.S. Environmental Protection Agency  
6608 Hornwood  
Houston, TX 77074

Dear Dr. Langley:

Several samples of waste substances from our Fort Worth plant were taken by Mr. R. L. Hiller of the EPA Region VI staff on July 30, 1980 and were subsequently forwarded to your laboratory for analysis. These samples and their EPA designation are as follows:

<u>EPA Sample Designation</u>	<u>Sample Location</u>	<u>Sample Description</u>
1	North Pond Effluent Box	Liquid containing sodium sulfate
2	South Pond Sludge	Solid containing alumina and sodium sulfate
3	Downstream of Stormwater Outfall	Sediment from river bottom and settled solids from Cyanamid stormwater outfall
4	Spoil Pile at North-end of Bird Sanctuary	Solid containing alumina

Our understanding is that these samples are to be analyzed for 16 metals (Sb, As, Be, Cd, Cr, Co, Cu, Pb, Hg, Ni, Se, Ag, Tl, Zn, V, and Mo) and that the solid and sediment samples will be digested in nitric and/or nitric/hydrochloric acid prior to analysis. Inasmuch as this will determine the total metal content including the insoluble fraction that does not impact the environmental, American Cyanamid Company requests that the extraction procedure utilized determine only the soluble fraction since this is indication of the "real world". In this regard we recommend use of the distilled water leachate test proposed by the American Society of Testing Material (ASTM Method D-19.12.03) or the EP extraction test promulgated under Section 261.24 of the Resource Conservation and Recovery Act (RCRA); copies of both of these methods are attached.

SUPERFUND FILE

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American Cyanamid

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We would appreciate notification of the procedure(s) you elect to use so that we may duplicate them on the split samples taken. In the interim, please contact Mr. A. H. Hoff (Plant Manager of the Fort Worth plant) at (817) 332-2127 or me at (201) 831-3996 if you have any questions.

Very truly yours,

Richard B. Tabakin  
Coordinator, Environmental Science

RBT/njw  
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Attachments

cc: R. L. Hiller - EPA Dallas  
C. Gazda - EPA Dallas  
A. H. Hoff - Fort Worth